

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

: Master File No. 10-CV-00990-SLR  
:  
IN RE WILMINGTON TRUST : (Securities Class Action)  
SECURITIES LITIGATION :  
:  
This Document Relates to: ALL ACTIONS : Hon. Sue L. Robinson  
:  
:  
: ELECTRONICALLY FILED  
:  
: Oral Argument Requested

**SCHEDULING STIPULATION AND PROPOSED ORDER GOVERNING  
MOTIONS TO DISMISS SECOND AMENDED COMPLAINT**

WHEREAS, on March 29, 2012, the Court granted Defendants' motions to dismiss the Consolidated Amended Complaint with leave to replead;

WHEREAS, on May 10, 2012, Lead Plaintiffs filed their Second Amended Consolidated Securities Class Action Complaint (the "SAC");

WHEREAS, by the Stipulation And [Proposed] Order Extending Time To File Amended Complaint And To Respond To Amended Complaint, dated March 27, 2012, the parties agreed that "the parties expect to negotiate and submit a further scheduling stipulation after the amended complaint is filed and mediation, if any, is scheduled . . .;"

WHEREAS, certain of the parties have engaged in mediation in an effort to resolve this matter;

WHEREAS, the mediation has not yet been successful and the parties wish to enter into a schedule to govern proceedings with respect to Defendants' motions to dismiss the SAC;

WHEREAS, the parties have agreed, subject to the Court's approval, that the same page limitations should apply to Defendants' motions to dismiss the SAC as the Court had previously approved with respect to their motions to dismiss the Consolidated Amended Complaint, except

that the parties have further agreed, subject to the Court's approval, that the page limits for the opening briefs of the Underwriter Defendants (J.P. Morgan Securities LLC and Keefe, Bruyette & Woods, Inc.) and KPMG LLP in support of their respective motions to dismiss the SAC should be extended to 25 pages, and that the page limits for their respective reply briefs should be extended to 14 pages;

IT IS HEREBY STIPULATED, by and between Lead Plaintiffs and Defendants, subject to the approval of the Court, as follows:

1. Defendants shall file motions to dismiss the SAC, and opening briefs in support thereof, on or before July 27, 2012. The page limit for the opening brief of the Wilmington Trust Defendants is extended to 60 pages. The page limit for the opening briefs of the Underwriter Defendants and KPMG LLP is extended to 25 pages in each case.

2. Lead Plaintiffs shall file their answering brief in opposition to Defendants' motions to dismiss the SAC on or before September 21, 2012. The page limit for Lead Plaintiffs' omnibus answering brief is extended to 85 pages.

3. Defendants shall file their reply briefs in further support of their motions to dismiss the SAC on or before October 26, 2012. The page limit for the reply brief of the Wilmington Trust Defendants is extended to 20 pages. The page limit for the reply briefs of the Underwriter Defendants and KPMG LLP is extended to 14 pages in each case.

Respectfully submitted,

/s/ Pamela S. Tikellis

Pamela S. Tikellis (ID No. 2172)  
A. Zachary Naylor (ID No. 4439)  
CHIMICLES & TIKELLIS LLP  
222 Delaware Ave., 11th Floor  
P.O. Box 1035  
Wilmington, Delaware 19899-1035  
Telephone: (302) 656-2500  
Facsimile: (302) 656-9053  
PamelaTikellis@chimicles.com  
ZN@chimicles.com

*Attorneys for Merced County Employees' Retirement Association, Coral Springs Police Pension Fund, St. Petersburg Firefighters' Retirement System, Pompano Beach General Employees Retirement System, and Automotive Industries Pension Trust Fund*

/s/ Robert S. Saunders

Thomas J. Allingham II (ID No. 476)  
Robert S. Saunders (ID No. 3027)  
SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM LLP  
One Rodney Square  
P.O. Box 636  
Wilmington, Delaware 19899-0636  
Telephone: (302) 651-3000  
Fax: (302) 651-3001  
Thomas.Allingham@skadden.com  
Rob.Saunders@skadden.com

*Attorneys for Defendants Ted T. Cecala, Donald E. Foley, David R. Gibson, Robert V.A. Harra, Jr., Kevyn N. Rakowski, Carolyn S. Burger, R. Keith Elliott, Gailen Krug, Stacey J. Mobley, Michele M. Rollins, David P. Roselle, Oliver R. Sockwell, Robert W. Tunnell, Jr., Susan D. Whiting, Rex L. Mears, Louis J. Freeh, and Wilmington Trust Corporation*

/s/ Virginia A. Gibson

Virginia A. Gibson (ID No. 3699)  
HOGAN LOVELLS US LLP  
1835 Market Street, 29th Floor  
Philadelphia, PA 19103  
Telephone: (267) 675-4635  
Fax: (267) 675-4601  
Virginia.gibson@hoganlovells.com

*Attorneys for Defendant KPMG LLP*

/s/ Stephen C. Norman

Stephen C. Norman (ID No. 2686)  
POTTER ANDERSON & CORROON LLP  
1313 North Market Street, 6th Floor  
Hercules Plaza  
P.O. Box 951  
Wilmington, Delaware 19899  
Telephone: (302) 984-6000  
Fax: (302) 658-1192  
snorman@potteranderson.com

*Attorneys for Defendants J.P. Morgan Securities LLC and Keefe, Bruyette & Woods, Inc.*

*/s/ Laura Davis Jones*

Laura Davis Jones (ID No. 2436)  
Curtis A. Hehn (ID No. 4264)  
PACHULSKI STANG ZEIHL & JONES LLP  
919 N. Market Street, 17th Floor  
P.O. Box 8705  
Wilmington, Delaware 19899-8705  
Telephone: (302) 652-4100  
Fax: (302) 652-4400  
ljones@pszjlaw.com  
chen@pszjlaw.com

*/s/ David E. Wilks*

David E. Wilks (ID No. 2793)  
Andrea S. Brooks (ID No. 5064)  
WILKS, LUKOFF & BRACEGIRDLE, LLC  
1300 N. Grant Avenue, Suite 100  
Wilmington, Delaware 19806  
Telephone: (302) 225-0850  
Fax: (302) 255-0859  
dwilks@wlblaw.com  
abrooks@wlblaw.com

*Attorneys for Defendant William B. North*

J. Douglas Baldridge  
George Kostolampros  
VENABLE LLP  
575 7th Street, NW  
Washington, DC 20004  
Telephone: (202) 344-4000  
Fax: 202-344-8300  
GKostolampros@Venable.com

*Attorneys for Defendant Thomas L. DuPont*

DATED: July 6, 2012

IT IS SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2012.

---

The Honorable Sue L. Robinson  
United States District Court Judge